

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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| In re: |) | Chapter 11 |
| |) | |
| W. R. GRACE & CO., <u>et al.</u> |) | Case No. 01-01139 (JKF) |
| |) | (Jointly Administered) |
| Debtors. |) | |
| |) | Related to Docket Nos. 13120, 13406, 14510 |

**CERTIFICATION OF COUNSEL REGARDING AMENDED SCHEDULING ORDER
FOR ADJUDICATION OF ASBESTOS PD CLAIMS**

1. At the April 9, 2007 hearing the Court conducted a status conference with respect to the hearing on certain specific objections to Asbestos PD claims scheduled for April 23, 24, and 25, 2007 (the “April 23-25 Hearing”). Based on the rulings made at the status conference, the Court ordered the Debtors and Debtors in Possession (the “Debtors”) to submit an order (the “Scheduling Order”) providing modifications and additions to the Amended Order Setting Forth Various Deadlines Regarding Objections to Asbestos Property Damage Claims entered on October 13, 2006 (the “October 2006 CMO”).

2. The Debtors forwarded proposed modifications to the October 2006 CMO to the Property Damage Committee and certain other property damage claimants’ counsel for comments. The Debtors incorporated all of the comments received by the PD Committee and claimants’ counsel into the proposed Scheduling Order, with the exception of requested modifications referencing Exhibit A to the October 2006 CMO, a comprehensive list of objections to property damage claims that were originally intended to be addressed at the April 23-25 Hearing. The Debtors submit that references to the entire original list of objections to

property damages claims is not necessary because the list has been significantly shortened due to the Debtors' claims resolution efforts, and the use of the longer list is more likely to confuse remaining property damage claimants. Counsel for the Debtors advised counsel for the PD Committee that the Debtors intend to use the shorter list of remaining property damage claims at the April 23-25 hearing and will identify in that list the type of objection.

3. Accordingly, the Debtors respectfully request that the Court approve the proposed Scheduling Order attached hereto as Exhibit A.

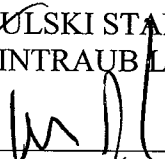
Dated: April 10, 2007

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